

**VIA ECF**

June 6, 2025

Hon. Ona T. Wang  
Southern District of New York

RE: *In re OpenAI Copyright Litigation*, 25-md-3143 (SHS) (OTW)  
This Document Relates To: 23-CV-11195

Dear Magistrate Judge Wang:

The New York Times Company (“The Times”), Daily News, LP, et al. (“Daily News Plaintiffs”), and The Center for Investigative Reporting (“CIR”) (collectively the “News Plaintiffs”) respectfully request an opportunity to review and respond to OpenAI’s forthcoming proposal regarding “sampling of the 30-day tables of consumer output log data,” and “proposed order regarding the specific sampling process, consistent with the discussion on the record, by June 6, 2025.” Dkt. [79](#).

After not receiving a sampling proposal from OpenAI, News Plaintiffs emailed OpenAI on June 3, 2025, asking that OpenAI share its proposal “so that News Plaintiffs may review and the parties have an opportunity to meet and confer as needed in advance of the submission.” OpenAI refused to do so. The email correspondence is attached hereto as Exhibit A.

Regretfully, News Plaintiffs still have not received OpenAI’s sampling proposal. News Plaintiffs therefore respectfully request that the Court provide News Plaintiffs with an opportunity to discuss the proposal with their experts and submit a response to the Court on or before June 11, 2025.

June 6, 2025

Respectfully submitted,

/s/ Steven Lieberman  
Steven Lieberman  
Rothwell, Figg, Ernst & Manbeck, P.C.

/s/ Ian B. Crosby  
Ian B. Crosby  
Susman Godfrey L.L.P.

/s/ Matt Topic  
Matt Topic  
Loevy & Loevy

cc: All Counsel of Record (via ECF)